

Montanez, Yeliann

From: Durden, Brian
Sent: Wednesday, July 3, 2019 11:48 AM
To: Webber, Heather
Cc: Maher, Jim; Kallemeyn, Thomas; Cosgrove, Pamela; Holmes, Michael P
Subject: FW: Montco Research Products - Janice Drive, Hollister , FL - aerial photo/list of chemical product materials and location
Attachments: Post Site Visit Evaluation and Recommendation.docx; Montco Aerial.pdf; IMG_0070.JPG; IMG_0063.JPG; IMG_0105.JPG; IMG_0095.JPG

Fyi

The following email was sent to the consultant to give them some feed back from the site visit.

-----Original Message-----

From: Durden, Brian
Sent: Wednesday, July 3, 2019 11:43 AM
To: John J. McNally <john@mcnallylawpa.com>; Neeley, Michelle <Michelle.Neeley@dep.state.fl.us>
Cc: Han Sunoco <hsunoo@comcast.net>; Holmes, Michael P <Michael.P.Holmes@FloridaDEP.gov>
Subject: RE: Montco Research Products - Janice Drive, Hollister , FL - aerial photo/list of chemical product materials and location

Thank you for the email including detailed site map and approximate materials located on site. Based on the observations made during the July 2, 2019, site visit to following recommendations are offered. See attached word document.

I look forward to chatting with regards to my comments if you have any questions.

Brian Durden
Florida Department of Environmental Protection Northeast District/Permitting Program Environmental Manager
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Survey Link:
http://floridadep.customer-survey.sgizmo.com/s3/?snc=1531149079_5b437b17660648.37756612&sg_navigate=start

-----Original Message-----

From: John J. McNally <john@mcnallylawpa.com>
Sent: Monday, July 1, 2019 8:20 PM
To: Durden, Brian <Brian.Durden@FloridaDEP.gov>; Neeley, Michelle <Michelle.Neeley@dep.state.fl.us>
Cc: Han Sunoco <hsunoo@comcast.net>
Subject: FW: Montco Research Products - Janice Drive, Hollister , FL - aerial photo/list of chemical product materials and location

Brian/Michelle/HanI am providing this information so you are connected with my client, Han Sunoo, and connected by phone to coordinate the site visit tomorrow morning at 10am. His phone number is 386-372-5009 and I have included Han in this email so we are all connected....Brian can you provide a cell phone for us to reach you.

Han...I know we have confirmed the site meeting for tomorrow morning and please confirm that 10 am is good for you.

Attached is an aerial photo/figure with site areas, and list of chemical materials.

We can review and discuss and further clarify the site information as discussed for purposes of disposition of products and disposal of waste solution.

We are also contacting the disposal company that has routinely taken the caustic solution in the past so we can address as soon as possible.

Please let me know any questions...and please coordinate/confirm site meeting time.....and we can discuss tomorrow even when you are at the site.

Thank you again and look forward to addressing the site together.

Thanks.

John.

John J. McNally, P.E., Esq.

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Post Site Visit Evaluation and Recommendation - High Priority

1. Scrubber Drum (Caustic Soda) Stage Area - over 60 + drums and over pack -drums - area was not accessible due to secondary containment are being almost completely filled with water. The water in the secondary containment exhibited higher pH possibly as a result of leakage from one or more of the Caustic Soda drums being stored in this area. Staff are extremely concerned about this area which appears to be experiencing periodic discharges from the secondary containment are during periods of heavy rain. It is strongly advised a hazardous waste determination to be conducted on water in the secondary containment and that the water be removed and properly disposed of. It is further recommended that the drums stored in this area either be evaluated checking their integrity and then disposed of or moved to a secure area not prone to flooding since no one is available on the property to check the secondary containment areas on a regular basis.
2. Swollen Drums and Overpack Drums – swollen drums and overpack drums are usually characteristic of drums containing damaged and/or non-usable chemicals or drums in danger of rupturing and releasing their contents to the environment. Department staff strongly recommend that a hazardous waste determination be made on these drums, identifying their contents and determining of proper disposal is needed.
3. Used Oil Drums, used oil totes, and used oil AST – while these containers were properly marked, closed and stored. It is recommended that the all used oil located on the property be removed and properly disposed of in order to avoid any spills or leaks that can occur from unsupervised long-term storage at a non-operational facility with no daily inspections of the containers.
4. Hundreds of drums (weak $ZnCl_2$), waste water, EBC Crude, Used Oil Totes – most of the material in this area was identified by Mr. Sunoo as a waste material not suitable for regeneration or reuse in the process should be plant become operational again. Department staff recommends that the drums and totes in this area be removed from the property and properly disposed of.
5. damaged reactor tank in the area of the Diesel AST has damaged piping on-top venting chemicals to the atmosphere. Open or unsealed drums allowing chemicals to vent to the atmosphere. Strong chemical smell coming from these area.

Post Site Visit Evaluation and Recommendation - Lower Priority

1. Covered roll-off container filled with construction and demolition debris from the fire should be disposed of.
2. Many of the secondary containment areas around the large storage tanks are partially filled with rain water. This decreases the storage capacity of the secondary containment are to less than the volume of one or all the tanks located within the secondary containment system. It is not known how much product/chemical is located in each tank and constant contact with water and partial submergence is causing corrosion of the tanks, piping, and other equipment located within the secondary containment systems. Department staff recommend that all water located within the secondary containment systems be evaluated and either properly disposed of or discharged to the property if it meets water quality standards. Department staff further recommend that all tanks be drained of their contents, triple rinsed, and certified clean so the

secondary containment can be allowed to drain freely in the future until such time as the facility can begin operating again.

3. There were many new bags of chemicals and containers of liquids observed located on the property: Acetone, zinc chloride, ethylbenzene chloride, caustic soda, isopropanol, Hydrochloric acid, monopentaerythritol, used in the manufacturing process. While these chemicals have not been identified as a waste at this time, if the plant is not able to be rebuilt and/or become operations then all chemicals located on the property will need to be disposed of or removed and properly reused elsewhere. You may find **Southern Waste Information Exchange (SWIX)** a helpful resource for locating companies that may be able to use or repurposed some of the chemicals located on the property. They can be contacted at 1-850-386-6280, <http://mxinfo.org/list.cfm>

Southern Waste Information eXchange, Inc. (SWIX)

Learn more about SWIX

The WasteXchange is funded by

the Florida Department of Environmental Protection.

Post Office Box 960, Tallahassee, FL 32302

(800) 441-7949

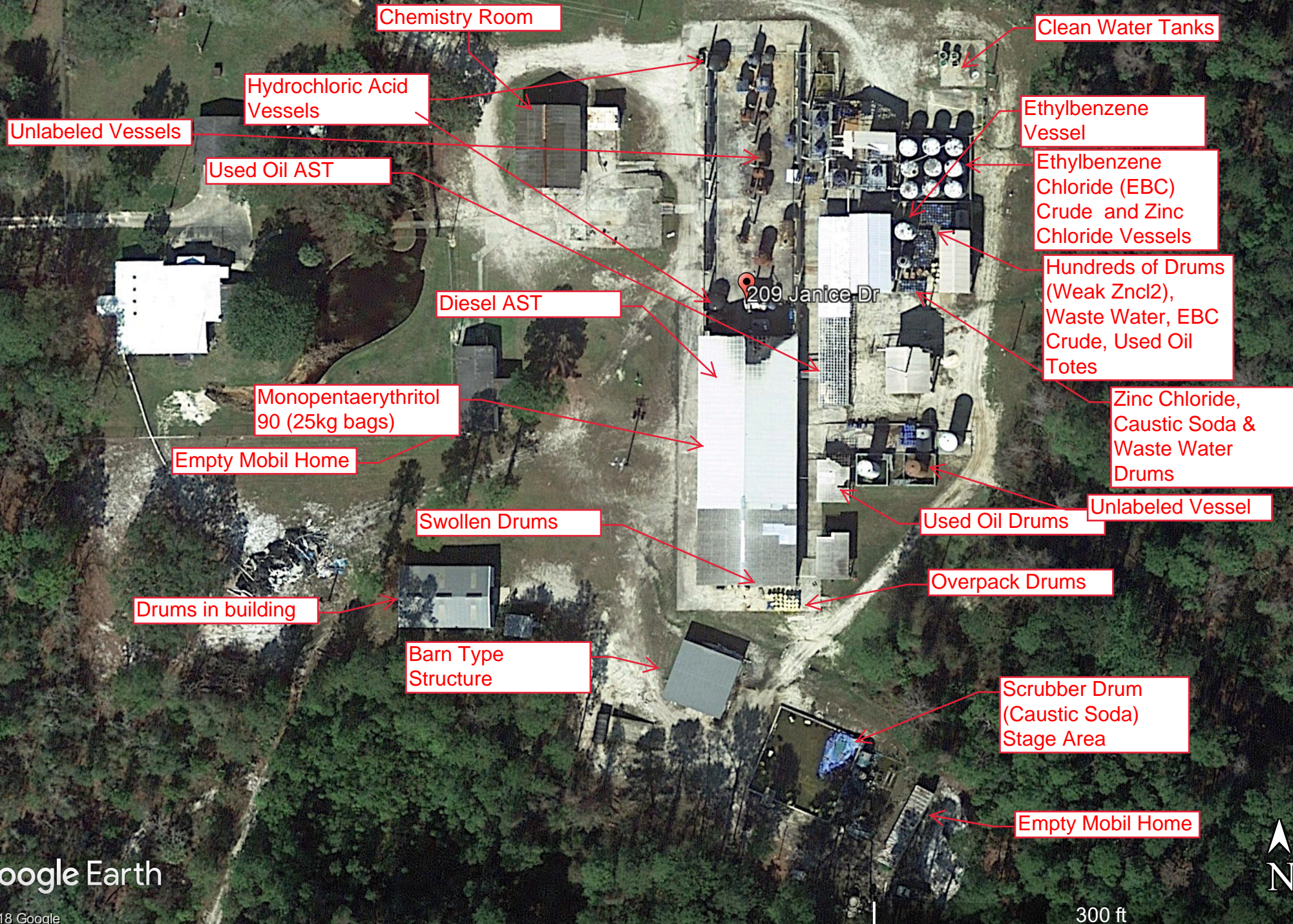
4. High pressure cylinders – there were several high-pressure cylinders located on the property oxygen, acetylene, propane, and propylene oxide. These cylinders should be evaluated to determine how much gas remains in each and a company contacted to remove the cylinders from the property. **Several of the acetylene cylinders were observed laying on their side. Acetylene can be explosive when nit stored property and horizontal storage of acetylene cylinders is regarded as unsafe storage.**
5. On-going ground water contamination – a new set of monitoring data and either restart the extraction system or propose a new clean up strategy for this site will need to be considered once the high priority items have been addressed.

Untitled Map

Write a description for your map.

Legend

209 Janice Dr





07/02/2019



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